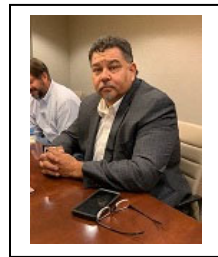


IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF OKLAHOMA

(1) LAURIE GARLAND, an)
individual,)
)
Plaintiff,)
)
-vs-) No. CIV-2020-206-RAW
)
(1) STATE OF OKLAHOMA EX REL)
OKLAHOMA DEPARTMENT OF)
CORRECTIONS)
(2) CHRISTOPHER REDEAGLE,)
individually)
(3) SHARON McCOY, individually)
(4) JOE ALLBAUGH, individually)
(5) PENNY LEWIS, individually)
(6) RABEKAH MOONEYHAM,)
individually)
(7) HEATHER CARLSON,)
individually)
(8) BOARD OF CORRECTIONS)
)
Defendants.)



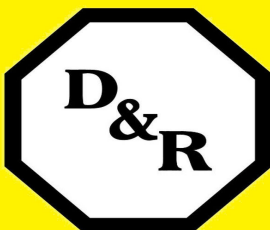
DEPOSITION OF CHRISTOPHER REDEAGLE

TAKEN ON BEHALF OF THE PLAINTIFF

IN TULSA, OKLAHOMA

On JULY 14, 2021

REPORTED BY: KASEY D. EGELSTON, CSR



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DEFENDANT'S
EXHIBIT

16

1 A No.

2 Q Did you ever talk about her kids or where
3 she went to school or anything like that?

4 A No.

5 Q Was Warden McCoy gone a lot during
6 February, March of 2019?

7 A Not that comes to mind. I mean, nothing --

8 Q Okay. When you were interviewed by Randy
9 Knight, do you remember that interview?

10 A Yes.

11 Q Were you expecting it?

12 A No.

13 Q Was it a surprise when it actually
14 happened?

15 A Yeah.

16 Q I'm trying to look at the date. Was it
17 April 2nd or 3rd, something like that?

18 A Something like that, yes.

19 Q Here it is. April 3, 2019; is that right?

20 A Yes.

21 Q It looks like he showed up in the morning.
22 Does that comport with your memory?

23 A Yes.

24 Q You didn't expect -- you were completely
25 unaware; right?

1 Q Okay. Was Warden McCoy the faculty
2 director at the Eddie Warrior Correctional Center?

3 MS. HAWKINS: Object to form.

4 Q (By Mr. Dalton) Do you know?

5 A I don't know. I've never heard of that
6 term.

7 Q Warden McCoy's leadership style was -- you
8 said she held people accountable -- accountability.
9 Was she hands-on?

10 A What do you mean hands-on?

11 Q Would she walk through and show you how she
12 wanted a job done? Would she look to see how things
13 were being done and then show somebody the proper
14 way to do it, or was she more delegating?

15 A No. She would walk you through and tell
16 you. She wouldn't do it. But yeah, she would tell
17 you what she wanted done.

18 Q Did she walk through and tell you how she
19 wanted things done daily, weekly, monthly?

20 A Probably more monthly.

21 Q Okay. Did she maintain a system of records
22 on a regular basis? Was she good about keeping up
23 with the records she had to keep?

24 A I don't know. I didn't supervise her.

25 Q Was she absent with any regularity during

1 2018?

2 A No.

3 Q Was she getting ready to transfer to
4 another facility? To Jess Dunn, maybe?

5 A Not really. She wasn't getting ready to.
6 They just told her one day that you're going over
7 there.

8 Q During that time was she gone at Jess Dunn
9 a bunch or was she still at Eddie Warrior all the
10 time?

11 A No. She was --

12 Q Eddie Warrior?

13 A Eddie Warrior, yeah.

14 Q In your mind, she was at Eddie Warrior just
15 as much in 2018, as she had been -- or '19, that she
16 had been in '18 and the year before?

17 A Yes.

18 Q She didn't -- did she have any reason to
19 leave the facility with any regularity? Or was she
20 at the facility most of the time?

21 A No. She was there most of the time. Eight
22 hours a day.

23 Q Okay. Non-routine incidents are supposed
24 to be written up by all staff; correct?

25 A The staff who witnessed it.